

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Newport News Division**

**KEVIN REAGAN,**  
*Plaintiff,*

v.

**Civil Action No. 4:23-cv-158**

**JOHN RATCLIFFE, Director,**  
**Central Intelligence Agency,**  
*Defendant.*

**DEFENDANT’S CONSENT MOTION FOR EXTENSION OF TIME AND  
MEMORANDUM IN SUPPORT THEREOF**

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and Local Civil Rule 7(I), Defendant, John Ratcliffe, Director, Central Intelligence Agency, respectfully requests a seven (7) day extension of time to file a reply brief in support of Defendant’s Motion to Dismiss on or before August 11, 2025. In support of this request, Defendant states as follows:

1. On June 12, 2025, Defendant filed his Motion to Dismiss Plaintiff’s Amended Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6). *See* ECF Nos. 61, 62.

2. On July 28, 2025, after obtaining an extension of time, Plaintiff filed his Opposition to Defendant’s Motion to Dismiss. *See* ECF Nos. 64, 65, 67. Plaintiff served a copy of his Opposition upon counsel for Defendant via electronic filing using the Court’s CM/ECF system on the same date. *See* ECF No. 67 at 2.

3. Pursuant to Local Civil Rule 7(F)(1), Defendant’s reply brief in support of Defendant’s Motion to Dismiss is due on or before August 4, 2025. *See* E.D. Va. L. Civ. R. 7(F)(1) (stating that reply brief in support of motion is due “within six (6) calendar days after the service of the opposing party’s response brief.”).

4. Prior to filing a reply brief, counsel for Defendant must provide a draft reply brief to the CIA for review and approval. The assigned agency counsel from the CIA will be out of the

office on July 31 and August 1, 2025. Accordingly, counsel for Defendant requires additional time to permit the CIA to review and approve a draft reply brief for filing. Defendant requests a seven (7) day extension of time to file a reply brief on or before August 11, 2025.

5. Counsel for Plaintiff does not object to Defendant's request for a seven (7) day extension of time to file Defendant's reply brief. A proposed order is attached for the Court's consideration.

Respectfully submitted,

JOHN RATCLIFFE, Director  
Central Intelligence Agency

ERIK S. SIEBERT  
United States Attorney

By: /s/ Daniel P. Shean

Daniel P. Shean, Assistant U.S. Attorney  
Virginia State Bar No. 84432  
Counsel for Defendant  
Office of the United States Attorney  
101 West Main Street, Suite 8000  
Norfolk, Virginia 23510-1671  
Telephone: (757) 441-6331  
Facsimile: (757) 441-6689  
Email: daniel.shean@usdoj.gov